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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Gail Belcher,

Plaintiff,

v.

Experian Information Solutions, Inc.;
Trans Union, LLC; American Express,
Inc., Capital One Bank, USA, NA;
Synchrony Financial dba
SYNCB/Amazon; and Discover
Financial Services, Inc.,

Defendants.

Case No.: 2:23-cv-00072-CDS-NJK

**Motion for an extension of time for
Defendant Experian Information
Solutions, Inc. to respond to
Plaintiff's complaint**

First request

Gail Belcher ("Plaintiff"), by and through counsel, hereby requests an extension of time for Defendant Experian Information Solutions, Inc. ("Defendant") to respond to Plaintiff's complaint. Defendant's responsive pleading is currently due on February 8, 2022. This is the first request for an extension of this deadline.

The extension is sought because the parties are engaged in active

1 settlement discussions and informal discovery to assist the case resolution
2 efforts. Plaintiff does not oppose an extension of Defendant's time to answer
3 the complaint so that the parties may devote their energies to resolving this
4 matter.

5 In good faith and not for the purposes of delay, Plaintiff submits this
6 motion, on behalf of Defendant, and requests that this Court extend Defendant's
7 deadline to file its responsive pleading until on or before **February 28, 2023**.

8 Dated: January 31, 2023.

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10 **FREEDOM LAW FIRM, LLC**

11 /s/ Gerardo Avalos
12 George Haines, Esq.
13 Gerardo Avalos, Esq.
14 8985 South Eastern Ave., Suite 350
15 Las Vegas, NV 89123
16 *Attorneys for Plaintiff*

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18 IT IS SO ORDERED:

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21 UNITED STATES MAGISTRATE JUDGE

22 DATED: February 1, 2023
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